

# **Citizens Advice Consumer Work Plan 2022/23: Summary of responses**



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# Introduction

This year we received 28 responses to our draft work plan. They were submitted by a range of stakeholders including key regulators, industry bodies, charities, interest groups and unions.

We welcome all the feedback we have received as an important way of developing our work. We have carefully assessed the feedback and made changes to our final work plan accordingly. This document summarises the feedback we received for each project and any changes made to the work plan.

# 1. Making markets work for consumers

## 1.1. Investigating discrimination in consumer markets (cross-sector consumer)

*2 respondents commented on this project. 2 responses were positive.*

### **Consumer Council for Water (CCW)**

CCW shared their interest in our work looking at people of colour being disadvantaged, and indicated a willingness to explore parallel work on this issue in water.

### **Crisis**

Crisis noted their interest in our work to explore discrimination in consumer markets, and similar work they are conducting in relation to race and homelessness. They indicated a willingness to collaborate further.

## 1.2. The impact of buy now pay later services (cross-sector consumer)

*2 respondents commented on this project. 1 response was positive and 1 was neutral.*

### **Consumer Council Northern Ireland (CCNI)**

CCNI highlighted their support for the work we have already delivered highlighting the impact of unregulated buy now pay later credit. They shared that they had referred to this work in their response to the HM Treasury consultation and their view that the government needs to bring forward regulation that provides protection for consumers and clearer paths to redress.

### **Apex Insight**

Apex Insight commented on the recent influx of BNPL firms to the market, and the apparent lack of regulation. They shared their view that this part of the credit market has worked well for consumers in recent years, and their evidence that customers of BNPL increasingly have multiple loans in place at one time. They also considered possible regulatory exemptions that could apply to BNPL credit.

### 1.3. Monitoring action to end the loyalty penalty (cross-sector consumer)

*0 respondents commented on this project.*

### 1.4. Protecting and strengthening postal regulation (post)

*8 respondents commented on this project. 6 responses were positive. 2 responses were neutral.*

#### **Action with Communities in Rural England (ACRE)**

ACRE supported our proposal to continue to advocate for greater consumer protections to keep post affordable and fair for everyone, especially those in rural communities.

#### **Royal Mail**

Royal Mail welcomed the ongoing engagement of Citizens Advice in the regulatory review process. Royal Mail noted it is committed to the universal, affordable nature of the Universal Service and wants to work with Citizens Advice to ensure it remains relevant and sustainable.

#### **Rural Services Network (RSN)**

RSN agreed that it is important for Citizens Advice to engage with Ofcom and other stakeholders about the review of postal regulation. RSN is concerned that if the Universal Service Obligation were to be weakened, rural areas would suffer the most.

#### **Blakemore Spar**

Blakemore Spar supported our plan to continue engaging with regulatory review processes. Blakemore Spar was also enthusiastic about regulatory reform in the parcels market, raising concern about the extent of bad practice by some parcel companies that goes unchecked.

#### **National Federation of SubPostmasters (NFSP)**

NFSP are concerned that online product discounts risk excluding people who aren't online and stated that products sold online cannot be allowed to undercut products offered at post office counters. NFSP suggested that there should be a level playing field for all parcels operators, with parity of service between on and offline.

#### **Keep Me Posted**

Keep Me Posted highlighted the importance of letter post and argued that many groups of people are negatively affected by not having access to paper bills and

communications. As such, Keep Me Posted would like to see Citizens Advice take a broader view of the importance of letter post beyond post exclusion and redirections.

#### **Consumer Council Northern Ireland (CCNI)**

CCNI agreed that the consumer bodies should continue to work together to ensure that the universal postal service is available to all consumers across the UK through regulatory price protections. CCNI also highlighted the importance of working together to ensure other consumer protection measures are adequate, including those related to complaint handling standards and disabled consumers.

#### **Post Office Limited (POL)**

POL agreed that it is important that all customers have access to the best pricing for products under the Universal Service Obligation. POL noted that discounts available for USO products bought online risk excluding some customers who are unable to purchase mail products online.

### **1.5. Ensuring parcel and postal services meet the needs of micro businesses (post)**

*8 respondents commented on this project. 7 responses were positive. 1 was neutral.*

#### **Action with Communities in Rural England (ACRE)**

ACRE welcomed our plan to ensure parcel and postal services meet the needs of microbusinesses, especially those in rural areas which play a large role in sustaining communities.

#### **Royal Mail**

Royal Mail was supportive of our plan to explore how microbusinesses access and use post offices and postal services. Royal Mail mentioned that any research carried out by Citizens Advice must be focussed on post and in line with the scope of the postal levy.

#### **Rural Services Network (RSN)**

RSN stated that letters and parcels remain important to the operation of microbusinesses in rural areas and that the proposed research on this topic would be useful. They suggested it would be helpful if it included a sufficient cohort of rural-based micro businesses so that any rural specific findings can be identified.

#### **DHL**

DHL was pleased that Citizens Advice will commission research to build understanding of the impact that Brexit has had upon microbusinesses.

### **National Federation of SubPostmasters (NFSP)**

NFSP agreed that microbusinesses are heavily reliant upon the postal and banking services that the Post Office can offer. It mentioned that personal banking offered via the post office counter is particularly important to local communities given the steady increase in bank branch closures.

### **UPS**

UPS highlighted their own research into small and medium businesses (SMBs) which found many SMBs were uncertain about customs and VAT requirements post-Brexit. UPS's research suggested that businesses could benefit from greater clarity over the complexities of collecting taxes from customers and/or filing VAT for business as well as explaining potential costs related to customs.

### **Consumer Council Northern Ireland (CCNI)**

CCNI stated that they look forward to working with Citizens Advice to help ensure parcel services are meeting the needs of micro and small businesses at a regional and UK level. CCNI recommended that Citizens Advice work to understand the experiences of micro and small businesses in Great Britain when sending goods to Northern Ireland via parcel services. CCNI noted this would give an insight into the way in which Brexit has affected postal services, consumers and businesses in Northern Ireland.

### **Post Office Limited (POL)**

POL suggested that tracking is an important consideration for marketplace sellers and that this should be included in our research on how microbusinesses use postal services. POL also noted that proof of postage is vital for microbusinesses and that this should be recognised to help ensure microbusinesses get the services they need when shipping to customers. POL agreed that navigating new customs processes post-Brexit has been an important consideration for businesses and stressed that accessible information about these processes should be made available to all businesses.

## **1.5 Safeguarding consumer experience in an evolving energy sector (energy)**

*6 respondents commented on this project. 6 responses were positive.*

### **Committee on Fuel Poverty**

The Committee highlighted the importance of focussing on the energy retail market where fundamental structural changes are taking place. The Committee are also interested to understand the role of the Citizens Advice Star Rating tool given changes in

tariff offerings and the future importance of service standards. They are keen that Citizens Advice is closely engaged in the details of the SoLR payments and effects of the UK Government's support package.

### **Consumer Scotland's Board-designate**

Consumer Scotland's Board-designate welcomed the importance attached in the work plan to ensuring consumers are protected in new and changing markets in supporting the transition to low carbon growth.

### **Electricity North West Limited (ENWL)**

ENWL agreed with the focus on this area given the number of energy suppliers who have exited the market. They also highlighted how the work of Citizens Advice in previous work plans has informed their own industry solutions for example on the amount of unsecured credit suppliers can hold.

### **Energy Saving Trust (EST)**

EST strongly welcomed this area of work at a time of historically high wholesale energy prices and consecutive supplier failures. They believe that research-based advocacy for regulatory reforms will deliver long-term benefits for consumers, agreeing with the need for a more resilient market, underpinned by better compliance and enforcement. They believe working alongside Ofgem to monitor consumer experiences will be key.

### **Heat Trust**

Heat Trust welcomed the work plan and stated that the prices affecting consumers and resulting debt may be a dominant issue in 2022/23.

### **Retail Energy Code Company (RECCo)**

RECCo agreed with this work area noting that the future energy retail markets must cater for all consumers in order to meet net zero targets, ensuring no consumers are left behind.

## **1.6. Supporting people to decarbonise their homes (energy)**

*6 respondents commented on this project. 6 responses were positive.*

### **Action with Communities in Rural England (ACRE)**

ACRE agreed that there needs to be more support to enable consumers to confidently take steps to decarbonise their homes. They support Citizens Advice plans to understand the experiences of consumers who retrofit and make energy efficiency



improvements and the barriers they face. They recommended that research includes segmentation to specifically understand the experiences of rural and off-gas households.

### **Committee on Fuel Poverty**

The Committee encouraged a collaborative approach on the topics of energy efficiency and retrofit programmes. They welcome commitments to hear the voices of those who struggle to access support or engage with energy efficiency programmes. The Committee also highlighted the importance of BEIS monitoring and evaluating programmes such as the Home Upgrade Grant (HUG) and identifies the helpful role Citizens Advice could play in this.

### **Consumer Council for Water (CCW)**

CCW welcomed this area of the work plan. They recognise links to their work, as the efficient use of energy and water are linked and contribute towards net zero. In particular, CCW welcomes the work on energy efficiency schemes and consumer incentives due to the relevance in the water sector.

### **Energy Saving Trust (EST)**

EST strongly agreed that consumers need better information, protection and support when making their homes more energy efficient or installing low carbon home technologies and that doing so will accelerate the transition to net zero. They welcome plans to research barriers to retrofit and energy efficiency improvements and to advocate for more wide-ranging support.

### **Retail Energy Code Company (RECCo)**

RECCo agreed with this area of the work plan and highlighted how they could work with Citizens Advice on green financial incentive options as part of their remit in operating the Green Deal Central Charge Database.

### **Rural Services Network (RSN)**

The RSN recognised the need to decarbonise homes and is particularly concerned about the needs of rural households in moving to low carbon heating and improving energy efficiency. In particular, the RSN believes there is a need for more grant funding for a 'fabric-first' approach among homes with older and poorly insulated homes. They encourage Citizens Advice to advocate for households who may face higher costs.

## 2. Better value infrastructure

### 2.1. Delivering net zero network investment at best value for money (energy)

*6 respondents commented on this project. 6 responses were positive.*

#### **Committee on Fuel Poverty**

The Committee encouraged Citizens Advice to ensure that clarity is provided in network company price controls. They believe there is a need to understand how far these monopoly companies' roles extend in delivering fuel poverty solutions.

#### **Consumer Council for Water (CCW)**

CCW welcomed the focus in the plan on ensuring network investment delivers best value for money. They noted that this is important as part of keeping bills affordable and highlight the parallels with their work on the water sector Price Review.

#### **Consumer Scotland's Board-designate**

Consumer Scotland's Board-designate agreed with the importance of representing the interests of consumers in regulated utilities such as energy networks.

#### **Electricity North West Limited (ENWL)**

ENWL welcomed the focus on value for money but believes it is important that Citizens Advice takes a broad view of consumer interest when considering lower investor returns for energy networks. ENWL also welcomes the ongoing dialogue on the development of the RIIO-2 price controls.

#### **Energy Saving Trust (EST)**

EST supported the continued effort in the work plan to ensure that network investment for net zero is good value for consumers and believe consumer confidence is important.

#### **Rural Services Network (RSN)**

The RSN welcomed this area of the work plan. They believe there is a need for electricity distribution network operators to improve the robustness and resilience of the rural electricity grid, given recent experiences from extreme weather events.

## 2.2. Ensuring post offices can support resilient communities (post)

*8 respondents commented on this project. 5 responses were positive. 3 responses were neutral.*

### **Department for Environment, Food and Rural Affairs (DEFRA)**

DEFRA is pleased we will continue to monitor the ongoing impact of outreach services and also stated it would be useful if Citizens Advice could explore the effectiveness of the new Post Office banking hubs.

### **Royal Mail**

Royal Mail noted that any future research carried out on post offices should follow the Citizens Advice work plan principle of being outcome focussed.

### **Apex Insight**

Apex Insight noted that the recent commercial arrangements with carriers like Hermes announced by Post Office Ltd expands the range of carriers using its Local Collect services. They suggested that this will enable post offices to better support resilient communities. Apex Insight encourages Citizens Advice to push for more carriers to be involved.

### **Rural Services Network (RSN)**

RSN asked if Citizens Advice might consider monitoring the impacts of the end of the exclusive agreement between Royal Mail and Post Office Limited. RSN suggested monitoring might be necessary as post offices continue to accept parcels from other operators and Royal Mail begins its service collecting parcels from residences.

### **Blakemore Spar**

Blakemore Spar asked if Citizens Advice was aware of Royal Mail's recent advertisements which drew comparison between online postage costs and 'over the counter' prices. Blakemore Spar is concerned that, if continued, this marketing could heavily impact the profitability of post offices and therefore the post office branch network.

Blakemore Spar also stated that Citizens Advice should examine how long a 'temporary' closure should last for. They suggested a time limit should be introduced to differentiate between temporary and permanent closures.

### **National Federation of SubPostmasters (NFSP)**

NFSP concurred that post offices have huge social value and noted that this value increased throughout the pandemic.

### **Consumer Council Northern Ireland (CCNI)**

CCNI supported our plan for work in this area. CCNI plans to develop an understanding of current and future opportunities for Northern Ireland consumers to access services from other parcel operators at post office outlets. The CCNI stated that sharing knowledge and insights with Citizens Advice on post office-related developments will be essential to do this.

### **Post Office Limited (POL)**

POL welcomed our plan to continue working to ensure post offices support communities and will continue to engage with us on this. However it noted that research into the post office network should be set in the context of the access criteria and the commercial environment in which the business operates.

## **2.3. Optimising consumer experience in the smart meter roll-out (energy)**

*5 respondents commented on this project. 4 responses were positive. 1 response was neutral.*

### **The Committee on Fuel Poverty**

The Committee are keen to understand the impact of smart metering on customers in fuel poverty and would welcome insights from Citizens Advice about this area.

### **Consumer Council for Water (CCW)**

CCW welcomed this area of the work plan and is interested in ideas from Citizens Advice on how to overcome barriers for harder to reach consumers.

### **Electricity North West Limited (ENWL)**

ENWL highlighted the importance of further smart meter rollout in enabling consumers to better manage their energy usage and be more flexible in the way they use energy.

### **Energy Saving Trust**

EST welcomed this area of the work plan and approved of the focus on advocating for better outcomes for harder to engage consumers.

### **National Energy Action**

NEA highlighted the importance of prepayment customers transitioning to smart meters and cited their research about the benefits of smart meters for this group.

## 2.4. Development of heat network regulation (energy)

*3 respondents commented on this project. 3 responses were positive.*

### **The Committee on Fuel Poverty**

The Committee believe Citizens Advice can play a key role in developing customer protections under the new regulatory framework for heat networks. They suggest this will protect consumers from unfair tariffs and charges, and poor service standards.

### **Energy Saving Trust**

EST welcomed the role that Citizens Advice will play as the advocate for heat network consumers and believe this will increase confidence in this industry.

### **Ombudsman Service**

The Ombudsman Service agreed that heat networks will play a vital role in helping the UK meet its net zero targets. They welcome the announcement by BEIS in December 2021 on the regulation, advocacy and ombudsman roles for consumers on heat networks. The Ombudsman Service look forward to working together to put in place a regulatory framework for consumer protection.

## 2.5. Improving the experience of public charging (energy)

*5 respondents commented on this project. 4 responses were positive. 1 response was neutral.*

### **Apex Insight**

Apex Insight is concerned that improving the experience of public charging may serve to encourage car dependency and not alleviate pollution or congestion. They recommend widening the scope of work in this area to include the charging of other modes of transport, such as e-bikes, scooters and other light electric vehicles. Apex Insight recommend using common standards to ensure that charging infrastructure does not negatively impact footways.

### **Energy Saving Trust (EST)**

EST are pleased to see this focus in the work plan as uptake increases towards the 2030 date to phase out internal combustion engine (ICE) vehicles. EST agree that the current system is unreliable and requires improvement to encourage consumer confidence and

increase uptake of electric vehicles. A better complaints and redress process will highlight barriers to the uptake of electric vehicles and the experience of charging infrastructure.

### **Ombudsman Services**

The Ombudsman Service agrees that charging experience needs to improve and that they expect more complaints about tariffs or equipments as the uptake of EVs increases. They welcome the opportunity to continue working with Citizens Advice in this area.

### **Rural Services Network (RSN)**

The RSN note that public charging points are fewer in number in rural areas causing issues for residents and visitors. The RSN are keen that advocacy on public charging looks at this issue.

### **Consumer Council Northern Ireland (CCNI)**

CCNI supports this area of the work plan and notes that there are opportunities to share insights.

## **3. A fair deal for consumers in vulnerable circumstances**

### **3.1. Weathering the cost of living crisis (cross-sector consumer)**

*2 respondents commented on this project. Both responses were positive.*

#### **Consumer Council Northern Ireland (CCNI)**

CCNI stated that this is a key priority for all consumers and noted that there are opportunities to share insights.

#### **Crisis**

Crisis shared their concerns about the myriad of issues impacting people through the cost of living crisis. They highlighted their interest in the impact of withdrawing rental protections introduced during the pandemic.

## 3.2. Ending post exclusion for millions of people (post)

*9 respondents commented on this project. 9 responses were positive.*

### **Women's Aid**

Women's Aid welcomed our plan to continue work on ending post exclusion. They mentioned they would like to see us centre survivors of domestic abuse in this research. They would also like Citizens Advice to continue working with specialist domestic abuse organisations.

### **Royal Mail**

Royal Mail agreed that all consumers should be able to access their post and will engage with Citizens Advice to progress work on the Address & Collect project.

### **Surviving Economic Abuse (SEA)**

SEA stated that it was promising to see our work on access to post continue. SEA provided some helpful comments about the logistics of an Address & Collect scheme, and how it might be used to best protect survivors of economic abuse.

### **Crisis**

Crisis is pleased that we will continue to tackle post exclusion as lack of access to post has a significant impact upon people experiencing homelessness.

### **Friends, Families and Travellers (FFT)**

FFT voiced their support for our plans in this area, stating that our work could make a big difference to all those who are affected by not having access to their post. FFT mentioned that working with relevant stakeholders will ensure that an Address & Collect service is safe, secure and available to all those excluded from post.

### **Rural Services Network (RSN)**

RSN supported Citizens Advice's proposal to continue work to address post exclusion.

### **National Federation of SubPostmasters (NFSP)**

The NFSP supported this scheme, stating that it will help many victims of domestic abuse. However, it noted that there are certain logistical issues that need to be addressed such as the storage of letters and responsibility over lost letters.

### **Consumer Council Northern Ireland (CCNI)**

CCNI stated that this piece of work should continue in order to secure viable solutions for those excluded from post across the UK. CCNI are keen to see if solutions being explored in Great Britain by Citizens Advice could also help those in Northern Ireland excluded from post. CCNI also noted that we need to explore if these solutions could help consumers that find themselves with no fixed address due to hate crimes.

### **Post Office Limited (POL)**

POL stated it would continue to play an active part in the progression of this project. It highlighted that our Address & Collect project should align with expectations of other third parties such as financial and health services to provide a holistic service. It also noted that the product should be applicable across the different nations of the UK to avoid duplication.

## **3.3. Tackling affordability and fuel poverty: raising standards for energy consumers in vulnerable circumstances (energy)**

*8 respondents commented on this project. 8 responses were positive.*

### **Committee on Fuel Poverty**

The Committee are in favour of this principle. They believe anticipating the risks to customers in a very volatile energy market is essential to develop speedy and practicable preventative policies and the work plan should be weighted towards this area in the short-term.

The Committee supports the focus on this work area and encourages specific policy recommendations from Citizens Advice on how to mitigate the risks of missing the interim Fuel Poverty target for England in 2025. These policy recommendations should include how to meet energy efficiency targets.

The Committee would also welcome further information on how Citizens Advice sought to engage service users in identifying the 4 priority themes. They support the commitment to share the experience of Citizens Advice clients as part of the advocacy work.

The Committee are interested in Citizens Advice providing evidence of how a successful and fair social tariff might be introduced to the retail energy market. In response to



feedback, the work plan has been amended to include a study which will consider whether there is a need for longer term price protection for energy consumers and what form that should take.

They are also keen to work collaboratively with Citizens Advice on potential reforms to the Warm Homes Discount scheme.

The Committee welcome the proposed work on the ECO4 scheme, the Home Upgrade Grant (HUG) and the Social Decarbonisation Fund. In particular, they encourage social and technical evaluation where possible and a focus on understanding the experience of those in the private rented sector.

The Committee acknowledge that Citizens Advice is well placed to ensure the Priority Services Register (PSR) works as effectively as possible for customers of utility companies. They particularly highlight the RIIO-ED2 price control processes which we have commented on [here](#).

### **Consumer Council for Water (CCW)**

CCW fully supported this area of the work plan to enhance support for consumers, in particular efforts to reform the Warm Home Discount scheme.

### **Electricity North West Limited (ENWL)**

ENWL acknowledged the importance of improving the level of support, effectiveness and efficiency of a wider Priority Services Register (PSR) to support consumers. They are keen to work with Citizens Advice on this.

### **Energy Saving Trust (EST)**

EST welcomed the work on tackling fuel poverty in England and Wales. They would be keen to work more closely with Citizens Advice on the development of future schemes in GB and England, particularly the Energy Company Obligation and Home Upgrade Grant scheme. EST also welcomed the plans to advocate for targeted support with the energy system to help those at particular risk of fuel poverty.

EST value the work to understand the lived experience of fuel poor households and identify gaps in support, including ensuring advice and support is tailored to individual needs. EST are in favour of the expansion in the number of referrals to energy advice services as demand increases.

## **National Energy Action**

NEA welcomed the work programme on fuel poverty including work on specific schemes like the Warm Home Discount and support collaborative working. They suggest one area that may require additional work is the introduction of social tariffs. In response to feedback, the work plan has been amended to include a study which will consider whether there is a need for longer term price protection for energy consumers and what form that should take. NEA also recommend consideration of a range of regulatory improvements which they support to protect consumers in vulnerable circumstances. These include:

- Extension of the use of the Priority Services Register (PSR) and improve the sharing and use of data
- Effective and appropriate information provision to customers such as translation services
- Additional support from energy suppliers to customers failing to access support via WHD broader group and through promoting Fuel and Water Direct
- Improve principles for debt collection and promote the support available to customers
- Protect prepayment customers during SoLR processes and ensure debts are transferred appropriately
- Repurposing the support provided by gas distribution networks and ensuring adequate provision by electricity distribution networks.

## **Ombudsman Services**

The Ombudsman Services welcomed this area of the work plan. They stated that there is a cost of living crisis with inflation and rising energy prices, meaning more consumers are facing difficulties affording essential services. They believe that cross-sector collaboration to share best practice is crucial.

They further recommend the use of social tariffs to help consumers remain connected and will continue sharing data via the tripartite working with Citizens Advice and Ofgem. In response to feedback, the work plan has been amended to include a study which will consider whether there is a need for longer term price protection for energy consumers and what form that should take.

## **Retail Energy Code Company (RECCo)**

RECCo welcomed this area of the work plan and the opportunity to work with Citizens Advice to improve the sharing of Priority Services Register data and enhance consumer

outcomes. They highlight the potential of the Retail Energy Code in delivering an effective solution.

#### **Rural Services Network (RSN)**

The RSN welcomed this area of the work plan and stated how important it is in the coming year. They emphasised the fuel poverty gap experienced in rural areas, which is more than twice the size compared to urban areas. They also highlighted schemes which do not address the needs of rural consumers living off the gas grid, and encouraged advocacy to consider rural fuel poverty.

### **3.4. Delivering better outcomes for energy consumers in 2022/23 (energy)**

*1 respondent commented on this project. 1 response was positive.*

#### **Consumer Council for Water (CCW)**

CCW supported the ambitions in this area of the work plan and are keen to work with Citizens Advice on referral pathways.

## **4. Protecting consumers in rapidly evolving markets**

### **4.1. Ensuring innovation delivers for all in the future retail market (energy)**

*1 respondent commented on this project. 1 response was positive.*

#### **The Committee on Fuel Poverty**

The Committee welcomed Citizens Advice commitment to develop services to support customers to engage with energy efficiency services and new flexibility tariffs.

## 4.2. Facilitating a smart and flexible transition to net zero that works for consumers (energy)

*6 respondents commented on this project. 5 responses were positive. 1 response was neutral.*

### **The Committee on Fuel Poverty**

The Committee noted that this theme correlates with something they believe should be a priority for BEIS and Ofgem and are keen to engage further on this topic.

### **Electricity North West Limited (ENWL)**

ENWL highlighted how continued progress with the smart meter rollout will enable them to use data which can lead to consumer benefits. However, they would welcome scrutiny from Citizens Advice of the Data Communications Company's (DCC). ENWL and other industry parties fund the DCC and are keen for analysis of the costs and services provided.

### **Energy Saving Trust (EST)**

EST valued plans to represent consumer interests in the development of the UK Government's regulatory approach to smart energy services. This includes issues such as data control and privacy. They believe Citizens Advice is well placed to lead the debate on consumer protection for smart charging.

### **National Energy Action (NEA)**

NEA highlighted the risk that consumers who are digitally excluded may not be able to easily access products, services and schemes to decarbonise their homes. They urge policy, regulatory and market design to not disadvantage these households.

### **Rural Services Network (RSN)**

The RSN supported this area of work and welcomes the focus on distributional impacts. They note that a successful and fair transition to net zero should not negatively impact those in rural areas.

### **Thermal Storage UK**

Thermal Storage UK strongly supported a more flexible electricity system and this area of the work plan. They also welcome opportunities to work collaboratively.

## 4.3. Putting people at the heart of net zero transition to low carbon heat (energy)

*5 respondents commented on this project. 4 responses were positive. 1 response was neutral.*

### **Apex Insight**

Apex Insight acknowledged that this area of work focuses on domestic heating and recommends thought is also given to reducing emissions from private cars. In particular, they recommended advocating for improved standards for new housebuilding to reduce the reliance on private vehicles.

### **The Committee on Fuel Poverty**

The Committee agreed that it is important that there are proper protections for consumers when making the transition to low carbon heat. They particularly encouraged a focus on fuel poor households, in addition to ensuring all consumers are protected.

### **Consumer Scotland's Board-designate**

Consumer Scotland's Board-designate welcomed this area of work and highlighted it as an area for collaborative working. In particular they are keen to engage with Citizens Advice on the new regulations arising from the Scottish Government's Heat in Buildings Strategy which will set new minimum energy efficiency standards and encourage adoption of low carbon heating systems. They believe these need to be easy to understand and designed to meet the needs of consumers.

### **Energy Saving Trust (EST)**

EST agreed that national and local decisions about low carbon heating must be consumer focused. They support the plans to advocate for meaningful public engagement on net zero with seamless consumer support. EST also welcomed plans to analyse the issues consumers experience with low carbon technology and energy efficiency measures in order to advocate for necessary consumer protections.

### **Ombudsman Services**

The Ombudsman Service agreed that it is important to understand the challenges consumers face in adopting low carbon technologies or implementing energy efficiency measures. They will continue to share data with Citizens Advice and others to help support a regulatory approach that keeps pace and protects consumers.

## 4.4. Putting people at the heart of parcel delivery (post)

*10 respondents commented on this project. 8 responses were positive. 2 responses were neutral.*

### **Consumer Scotland's Board-designate**

Consumer Scotland's Board-designate welcomed the work the Citizens Advice plans to undertake in this area. They also highlighted the importance of Citizens Advice and Consumer Scotland working together and sharing information to find a solution to problems in the parcels market.

### **Royal Mail**

Royal Mail stated it was happy to engage with Citizens Advice on this area of work. But they are keen that the proposed activity does not duplicate the research carried out by Ofcom in its 2020 Review of postal users' needs.

### **Apex Insight**

Apex Insight is supportive of our planned work on Pick Up Drop Off (PUDO) points. Apex Insight encourages Citizens Advice to assemble the necessary evidence to show that it would be beneficial to consumers to permit UK parcel shops to join more than one parcel network and to require networks which are currently closed to be opened to multiple carriers.

### **BEUC**

BEUC suggested that we should acknowledge the international dimension of challenges in the parcels market more assertively. BEUC is concerned that the safety of products sold online and then delivered in individual parcels is a major inconvenience for customs and market surveillance authorities. BEUC mentioned that as well as regulatory approaches, it might be useful for Citizens Advice to think about the necessary international cooperation for enforcement of consumer rights in these digital areas.

### **Rural Services Network (RSN)**

RSN was pleased to see planned work on PUDO points. RSN noted that those living in rural areas have less access to PUDOs. For this reason, RSN suggested it would be useful for future research in this area to include a rural cohort to build understanding of rural consumers' use and experience of PUDOs.

RSN also asked if Citizens Advice might consider monitoring the impacts of the end of the exclusive agreement between Royal Mail and Post Office Limited. RSN suggested monitoring might be necessary as post offices continue to accept parcels from other

operators and Royal Mail begins its service collecting parcels from residences.

### **DHL**

DHL supported Citizens Advice's planned research into PUDO networks, as they have championed carrier agnostic networks since they first branched into PUDO use. DHL would like to see the scope of the research expanded to include other PUDO options such as locker networks.

### **Blakemore Spar**

Blakemore Spar agreed that more consumer choice around when and where parcels are delivered would be a positive move. However, Blakemore Spar recognised that an increased PUDO network may bring added challenges for retailers, from finding storage space for parcels to working out who is responsible when things go wrong. Blakemore Spar also asked if any research has been conducted into the cost benefit for retailers for providing a PUDO point.

### **UPS**

UPS highlighted the current features of their Pick Up Drop Off point network of over 4,000 locations and how these can already be used by both drivers and consumers if nobody is at home to receive the parcel.

### **CCNI**

CCNI stated that putting people at the heart of parcel delivery is a key priority. CCNI believes there must be a reduction in delivery related problems such as delay, loss and damage, and parcels being left in inaccessible locations for disabled people. CCNI also noted that more transparency around the nature and extent of parcel surcharging by parcel operators is necessary.

### **Post Office Limited (POL)**

POL welcomed the research we proposed in this area and looks forward to engaging with us on this. POL recognised the importance of providing customers with greater convenience through out of home options and noted that it is working to extend the services it offers to customers in this space.

## **4.5. Exploring the role of algorithms in consumer outcomes (cross-sector consumer)**

*2 respondents commented on this project. 2 responses were positive.*

### **Department for Digital, Culture, Media & Sport (DCMS)**

DCMS welcomed the role Citizens Advice plays in representing consumer's voices. They outlined the objective of the National Data Strategy that better sharing of data leads to improved services for citizens. They hoped for further collaboration from Citizens Advice to ensure consumers' voices are heard in the development of data policy.

They looked forward to seeing progress on our work to explore the impact of algorithms on consumer outcomes. They also emphasised the government's commitment to supporting responsible data use, through embedding the Data Ethics Framework and publishing the Algorithmic Transparency Standard.

#### **Consumer Council Northern Ireland (CCNI)**

CCNI welcomed our proposed work in this area and shared their concerns about the lack of transparency around sophisticated algorithms being used to collect consumer data. They stated that consumers need greater understanding and control of their data and how it is used.

### **4.6. Scrutinising the impact of 'financial quicksand' across consumer markets (cross-sector consumer)**

*0 respondents commented on this project.*

### **4.7. Considering the future of regulation (cross-sector consumer)**

*0 respondents commented on this project.*

### **4.8. Representing energy consumers in the policy development process (energy)**

*1 respondent commented on this project. 1 response was positive.*

#### **Retail Energy Code Company (RECCo)**

RECCo welcomed the ongoing role that Citizens Advice plays on the REC Performance Assurance Board and support further collaboration. They also highlight how they would be in favour of Citizens Advice input into the development of a new consumer issues log for retail energy, which will prioritise development of the REC.



## 5. Index of responses

Action with Communities in Rural England (ACRE)  
Apex Insight  
BEUC  
Blakemore Spar  
Centrica  
Committee on Fuel Poverty  
Consumer Council for Water (CCW)  
Consumer Council Northern Ireland (CCNI)  
Consumer Scotland's Board-designate  
Crisis  
Department for Digital, Culture, Media & Sport (DCMS)  
Department for Environment, Food and Rural Affairs (DEFRA)  
DHL  
Electricity North West Limited  
Energy Saving Trust (EST)  
Energy UK  
Friends, Families and Travellers (FFT)  
Heat Trust  
Keep Me Posted  
National Energy Action  
National Federation of SubPostmasters (NFSP)  
Ombudsman Services  
Post Office Limited (POL)  
Retail Energy Code Company  
Royal Mail  
Rural Services Network (RSN)  
Surviving Economic Abuse (SEA)  
Thermal Storage UK  
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Women's Aid